

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

-----X
JOSHUA WINER,

Civil Action No.: 1:25-cv-02329-TWT

Plaintiff,

v.

UMAYMAH MOHAMMAD, et. al.,

Defendants.
-----X

**CONSENT MOTION FOR (I) EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT AND (II) TO EXTEND TIME
FOR PLAINTIFF’S RESPONSE TO ANY MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.1, Plaintiff Joshua Winer (“Plaintiff”) and Defendant Ibrahim Jouja (“Defendant”) file this consent motion to vacate the Clerk's default entered

1. On July 1, 2025, Plaintiff filed his Certificate of Service upon Defendant with this Court.
2. On July 10, 2025, Plaintiff filed a Notice requesting the Clerk of the Court to enter a default against Defendant, and the Clerk did so on July 11, 2025.
3. Plaintiff has agreed to stipulate to vacate the default and to extend the time for Defendant to file an answer or motion to dismiss through August 28, 2025.

4. Counsel for Defendant has agreed and stipulated to extend the time for Plaintiff to respond to Defendant's anticipated motions to dismiss, so that Plaintiff will have through November 7, 2025 to file his response.
5. This consent motion is made in good faith and no party will be prejudiced as a result of the extension.
6. A proposed order reflecting the agreed-upon terms is submitted with this motion.

Dated: August 24, 2025

/s/Jonathan Wallace

Jonathan Wallace

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Respectfully submitted,

**WEISSMANN ZUCKER EUSTER +
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/s/ David Katz on consent

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Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: August 24, 2025

/s/Jonathan Wallace
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**[PROPOSED] ORDER GRANTING CONSENT MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT AND PLAINTIFF’S DEADLINE
TO RESPOND TO MOTION TO DISMISS**

THIS MATTER is before the Court upon Plaintiff Joshua Winer and Defendant Ibrahim Jouja's Consent Motion for Vacating a Clerk's default and Extension of Time to Answer or Otherwise Respond to Complaint and to Extend Time for Plaintiff’s Response to a Motion to Dismiss (the “Motion”). Having considered the Motion and for good cause shown, it is hereby

ORDERED AND ADJUDGED that:

1. The Motion is GRANTED.
2. The Clerk's entry of default against defendant Jouja is vacated.

3. Defendant Jouja shall file his responses to the amended complaint on or before August 28, 2025.

4. If Defendants file a Motion to Dismiss the operative complaint, Plaintiff shall have through November 7, 2025 to file his response to the motion.

IT IS SO ORDERED this _____ day of _____, 2025.

THOMAS W. THRASH, JR.
United States District Judge

Presented by:

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